

AUG 10 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of Section 17 of)
the Cable Television Consumer)
Protection and Competition Act)
of 1992)
)
Compatibility Between Cable)
Systems and Consumer Electronics)
Equipment)
_____)

ET Docket No. 93-7

SUPPLEMENTAL COMMENTS OF BELLSOUTH

BellSouth Telecommunications, Inc. ("BellSouth")
hereby files its response to the Supplemental Comments of
the Cable-Consumer Electronics Compatibility Advisory
Group ("Advisory Group") filed on July 21, 1993 in the
above-captioned docket (Public Notice DA 93-954).

In its Supplemental Comments, the Advisory Group
proposes a number of specific short-term and long-term
measures designed to implement the requirements of
Section 17 of the Cable Television Consumer Protection
and Competition Act of 1992 ("Cable Act").¹ In summary,
Section 17 requires the Commission to prescribe
regulations to ensure compatibility between consumer
electronics equipment and cable systems, consistent with
the need to prevent theft of cable service, so that cable
subscribers will enjoy the full benefits of both the
programming available on cable systems and the functions

¹ 47 U.S.C. § 544.

available on related consumer electronics equipment. These Supplemental Comments are limited to addressing one particular component of the Advisory Group's proposal.

As a long-term measure to ensure the viability of "cable-ready" products as a means of curtailing compatibility problems, the Advisory Group recommends that the Commission require cable operators to provide signals in a form compatible with a standard "Decoder interface" specification. The Decoder interface would be developed by the Advisory Group and subsequently submitted to the Commission for inclusion in its cable rules. Under the Advisory Group's proposal, consumer electronics manufacturers and retailers would be precluded from using the term "cable-ready" in connection with any product that does not incorporate the Decoder interface specification.²

BellSouth supports industry efforts to develop interface standards that ensure compatibility between video program signaling and consumer electronic equipment. However, BellSouth reiterates its strong belief that any such interface specification standard should accommodate the technical needs of the total video

² See, Supplemental Comments of Advisory Group, p. 10-11.

marketplace and not be limited to developing unique solutions tailored to the cable industry.³

The "Decoder interface" proposed by the Advisory Group should be developed pursuant to an open industry forum in which engineering representatives of telephone companies, wireless CATV providers, the computer industry and the broadcast community can participate on an equal footing with cable industry representatives. If these groups are excluded from the standards-setting process, there is a substantial risk that the Decoder interface will be seriously flawed in that it will not meet the compatibility needs of other competitive delivery systems emerging in the video marketplace. For example, it is BellSouth's understanding that the Advisory Group's proposed Decoder Interface will not accommodate the base band digital video delivery technologies that may be used by some emerging competitors. The desirability of incorporating such emerging and alternative technologies into the Decoder interface specification should be addressed by the industry at large prior to submitting any proposed standard to the Commission for approval. This will allow for the more efficient use of industry resources and should avoid any delay which might arise if competing interests are denied a meaningful opportunity

³ See, BellSouth comments previously filed in this docket on March 22, 1993, p. 2.

to participate in the interface development process prior to the Commission placing a proposed standard on public comment as part of a rulemaking proceeding.

For good reason, the Commission naturally will be reluctant to mandate the adoption of any Decoder interface standard without a full assessment of its impact on alternative and future technologies. BellSouth urges the Commission to issue an order requiring that this industry assessment take place now pursuant to a nondiscriminatory and open process.


CONCLUSION

For the foregoing reasons, BellSouth submits that the public interest would best be served by establishing an industry forum and process in which all interested parties may participate in the development of a standard Decoder interface and that the Commission issue an order to that effect.

Respectfully submitted,

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August 10, 1993

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of August, 1993 serviced all parties to this action with a copy of the foregoing SUPPLEMENTAL COMMENTS OF BELLSOUTH by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to the parties as set forth on the attached service list.



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